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Attorneys for Defendant UNITED STATES  
 DEPARTMENT OF LABOR

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

THE CENTER FOR INVESTIGATIVE  
 REPORTING and WILL EVANS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
 LABOR,

Defendant.

) Case No. 22-cv-07182-WHA

)  
 )  
 ) **STIPULATED REQUEST TO STAY RELEASE**  
 ) **ORDER; [PROPOSED] ORDER**

WHEREAS, on December 22, 2023, the Court entered an order denying in part and granting in part the parties' cross-motions for summary judgment, Dkt. No. 51; and

WHEREAS, as part of that order, the Court ordered Defendant to "produce the remaining EEO-1 reports at issue within 28 days of" the order, *id.* at 13; and

WHEREAS, the Government's deadline to file a notice of appeal is sixty days from the date of that order, or February 20, 2024. *See* 28 U.S.C. § 2107(b); Fed. R. App. P. 4(a)(1)(B); and

WHEREAS, the decision to appeal rests with the Solicitor General of the United States, who needs time to consider the issue. *See* 28 C.F.R. § 0.20(b); and

1 WHEREAS, Defendant United States Department of Labor (“DOL”) has requested an extension  
2 of the production deadline to allow the Government time to consider its appellate options, and Plaintiffs  
3 have agreed to DOL’s request; and

4 WHEREAS, Plaintiff has requested that to the extent their time for filing a motion for attorneys’  
5 fees has begun to run, this deadline be extended an additional 30 days beyond the appeal deadline;

6 NOW THEREFORE, pursuant to Civil Local Rule 6-2, it is hereby stipulated by the parties to  
7 this action, through their counsel of record, as follows:

8 1. DOL’s deadline to release the records ordered produced by the Court in its December 22,  
9 2023 order, Dkt. No. 51, shall be extended to February 20, 2024.

10 2. To the extent that Plaintiffs’ time for filing a motion for attorneys’ fees and costs has  
11 begun to run or begins to run between the date of this stipulation and March 21, 2024, that deadline shall be  
12 extended to March 21, 2024.

13 The parties respectfully request that the Court enter an order extending the deadlines in  
14 accordance with this stipulation.

15 DATED: December 27, 2023

Respectfully submitted,

16 ISMAIL J. RAMSEY  
17 United States Attorney

18 /s/ Pamela T. Johann\*  
19 PAMELA T. JOHANN  
20 Assistant United States Attorney

Attorneys for Defendant

21 DATED: December 27, 2023

THE CENTER FOR INVESTIGATIVE  
22 REPORTING

23 /s/ Zachary E. Colbeth  
24 ZACHARY E. COLBETH

25 Attorneys for Plaintiffs

26 *\*The filer of this document hereby attests pursuant to Civil Local Rule 5-1(i)(3) that all signatories have*  
27 *concurred in the filing of this document.*

**[PROPOSED] ORDER**

Pursuant to stipulation, and good cause appearing therefor, IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
HON. WILLIAM ALSUP  
United States Senior District Judge